CYCLE II EXTERNAL ENVIRONMENTAL COMPLIANCE ASSESSMENT PRELIMINARY FINDINGS REPORT

BARRE FALLS DAM
HUBBARDSTON, MASSACHUSETTS

NED ENVIRONMENTAL LABORATORY
HUBBARDSTON, MASSACHUSETTS

U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts
02254-9149

December 1996

For Inter Corps Distribution Only

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EXECUTIVE SUMMARY

An environmental compliance assessment of Barre Falls Dam, Hubbardston, Massachusetts was conducted by a team of New England Division (NED) environmental professionals on 8 May 1996. This was a Cycle II External Assessment. The Cycle I External Assessment was conducted on 31 August-4 September 1992 .

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program, developed by the U.S. Army establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, State, local, Department of Defense (DoD), and U.S. Army environmental laws and regulations.

An overall ERGO compliance assessment considers 13 major environmental compliance categories. For each category, Federal, State and local laws, DoD and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained. The summary of deficiencies at Barre Falls Dam is as follows:

Significant Deficiencies - 0
Problems that pose a direct and immediate threat to human health, safety, the environment, or the facility's mission, and require immediate attention.

Major Deficiencies - 0
Problems that require action, but not necessarily immediate action, and pose a threat to human health, safety or the environment.

Minor Deficiencies - 10
Deficiencies that are usually administrative in nature. These problems require monitoring or planning for future mitigation.

Management Practices - 3
Items noted are not specifically covered by a specific regulatory requirement; however, they still require management attention.

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THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

1) Enhance Corps of Engineers environmental compliance at Federal, State and local levels.

2) Improve Corps of Engineers environmental management.

3) Build supporting financial programs and budgets.

4) Assure supervisors that their environmental programs are being implemented effectively in accordance with Corps of Engineers goals and objectives.

Periodic environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and provide necessary feedback to supervisors for organizing, directing, and controlling environmental compliance and protection activities.

New England Division's (NED's) ERGO program became operational in 1991. Because it is responsible for the majority of USACE facilities, Operations Directorate is tasked with the development and implementation of the ERGO program. Every five years, each NED project undergoes an external environmental compliance assessment. This assessment is conducted by a team of environmental professionals. Every NED project has already had one external environmental compliance assessment. The assessment described in this report is the second external assessment for this project, and is therefore known as a Cycle II External Environmental Compliance Assessment. The project itself is responsible for performing an internal self assessment annually, with the exception of those years when an external assessment is being done.

ASSESSMENT PROCEDURES

The ERGO assessment of Barre Falls Dam was conducted by a 7 person team comprised of NED personnel, and took place on 8 May 1996. The team followed a three phase approach. The first phase was to obtain pre-assessment information concerning its on-site activities (see Appendix A - Previsit Questionnaires) and research applicable Federal, State and local environmental regulations. This culminated in the development of site/facility-specific categories.

The second phase involved the on-site portion of the assessment. This involved an interview of project staff, followed by a facility tour, including major outgrants, to obtain a general overview of the facility operations. Typically, the team member would interview project staff responsible for a particular functional area, visually inspect the operations, and verify that required written documentation was in place. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project staff to apprise them of the review team's preliminary findings.

The third phase involves developing the draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of Barre Falls Dam followed the above procedures and covered the elements set forth in the 13 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment is based on observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered and, therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of Barre Falls Dam was dependent on complete disclosure by Project staff and outgrantees of all information regarding the operation and maintenance activities at the project.

It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

ERGO PROGRAM OBJECTIVES

The Environmental Review Guide for Operations (ERGO) program guidance is embodied primarily in two publications: The Environmental Assessment and Management (TEAM) Guide, applicable to participating DoD components, including the U.S. Army Corps of Engineers (USACE), and the Supplement to The Environmental Assessment and Management (TEAM) Guide, applicable to Corps of Engineers Civil Works activities, operating projects and floating plant, including outgranted lands and concessions. In addition, state-specific supplements have been prepared for some states.

Objectives of the TEAM Guide are as follows:

1. Compile applicable Federal regulations with DoD component operations and activities.

2. Synthesize environmental regulations, management practices, and risk management issues into consistent and easy to use checklists.

3. Serve as an aid in the assessment process and management action development phases of DoD component environmental assessment programs.

Objectives of the Supplement to the TEAM Guide are as follows:

1. Compile applicable Department of Defense (DoD) regulations, and Engineer Regulations (ERs) associated with USACE operations and activities.

2. Synthesize regulations, management practices, and risk management issues into consistent and easy-to-use checklists.

3. Serve as a reference document and educational tool for daily operations.

4. Serve as a guide for implementing the U.S. Army Environmental Strategy Into the 21st Century, which emphasizes environmental stewardship as an integral part of everything the USACE does.

DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, Federal regulations, State regulations and local regulations. Non-regulatory items, which are referred to in this report as management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will be categorized as follows:

SIGNIFICANT DEFICIENCY:

A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facility's mission.

MAJOR DEFICIENCY:

A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety or the environment. Any immediate threat, however, must be categorized as significant.

MINOR DEFICIENCY:

Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of noncompliance.

MANAGEMENT PRACTICE:

Management practice items are those for which there is no specific regulatory requirement; however they still require management attention.

Summary of Deficiencies for Barre Falls Dam

ERGO Compliance Categories	Sign. Findings	Major Findings	Minor Findings	MP Findings
Air Emissions Management	0	0	0	0
Cultural Resources Management	0	0	1	0
Hazardous Materials Management	0	0	0	0
Hazardous Waste Management	0	0	0	0
Natural Resources Management	0	0	5	1
Other Environmental Issues	0	0	1	0
Pesticide Management	0	0	0	0
POL Management	0	0	1	0
Solid Waste Management	0	0	0	1
Storage Tank Management	0	0	0	1
Toxic Substances Management	0	0	1	0
Wastewater Management	0	0	0	0
Water Quality Management	0	0	1	0
Totals	0	0	10	3

AIR EMISSIONS MANAGEMENT

No Findings

CULTURAL RESOURCES MANAGEMENT

FY 1996 ERGO Cycle II External Assessment
Barre Falls Dam

Historic and Archaeological Resources

Narrative

A site visit as part of the ERGO assessment was held on May 8, 1996 at the Barre Falls Dam project area. Corps fee lands at the project consist of approximately 557 acres located in three separate parcels in the towns of Barre, Hubbardston, Oakham, and Rutland, MA. There is no encroachment from development or industrial interests and the project area is associated with the MDC watershed and used as a public water supply.

The establishment of an interpretive program for the Powderkeg Mill (Historic Site #2) near the dam is to be commended for its contribution to the history and archaeology of the community prior to reservoir operation. This historic industrial site should be monitored for vandalism or any impacts from natural or man-made forces. Many of the other historic sites identified during the reconnaissance survey (Coldbrook Springs area for example) could also have great interpretive potential due to their good state of preservation. Identified historic sites should be monitored for any potential impacts and proper treatment coordinated with an NED archaeologist. Historic photos of the project area prior to dam construction (in Project Manager's office) should be maintained at the Project Office and copies made if possible.

As with other Corps project areas, any new development or construction including but not limited to, property grants or leases, agricultural leases, timber sales, gravel mining, dam or bridge repair (Pine Plains Bridge for example), landscape modifications, off-road vehicles, road or trail development or widening, recreation areas development or expansion, etc. should be coordinated with NED archaeological staff in order to safeguard cultural resources, particularly since further evaluation and intensive archaeological surveys are yet to be completed.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Project area has only had a reconnaissance level archaeological survey completed, in 1989. Several prehistoric and historic archaeological resources identified in the survey require further evaluation.

Criteria (What is the actual requirement?)
C.5.1. All Federal agencies are required to establish a program to locate, inventory, and nominate to the SOI all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register of Historic Places (36 CFR 60.9).

Suggested Solutions:
Funding should be made available to complete the necessary evaluation studies and the follow-up intensive archaeological survey.

Comments:

Assessor: Marcos A. Paiva

HAZARDOUS MATERIALS MANAGEMENT

No Findings

HAZARDOUS WASTE MANAGEMENT

No Findings

NATURAL RESOURCES MANAGEMENT

Natural Resources and Other Environmental Issues Narrative for
Barre Falls Dam ERGO Review

The ERGO Team Review and facility tour conducted on May 8, 1996 was very informative. The majority of natural resources compliance issues involve the preparation of documents (EA and Master Plan). This project has an approved OMP dated June 1993 which contains Forest and Fish and Wildlife Management Plans. One omission to the Fish and Wildlife Management Plan is a formal survey of threatened/endangered species for the project area. This information is necessary to complete a plan for maintenance, restoration or protection of habitat favorable to threatened/endangered species. A threatened/endangered species inventory is scheduled to be conducted in FY1999 and should be included in the OMP update (OMPs should be revised every 5 years). In addition, a wetland survey is scheduled during FY1999 and will be included in the EA.

Two findings were eliminated under the Special Pollutants Management, Noise section. The project now maintains a noise complaint log. There have been no problems related to the issue of noise. In addition, a noise survey was conducted in 1996.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The Master Plan for the Barre Falls Dam project is outdated and does not reflect current development of natural or man-made resources at the project.

Criteria (What is the actual requirement?)
NR.2. Master plans are required to be developed and kept current for all Civil Works projects and other fee owned lands for which the Corps has administrative responsibility for management (ER 1130-2-435, para 5, para 8, and para 9).

Suggested Solutions:
Preparation of the Master Plan for Barre Falls Dam is scheduled for FY2000.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The Project Manager at Barre Falls Dam has located areas where bare soil is exposed or active erosion is occurring. Several large areas are located in the vicinity of the dikes. Shallow, sandy soils have hindered erosion control measures, but some progress has been made.

Criteria (What is the actual requirement?)
NR.5. A protective vegetative cover or other measures shall be provided to control dust and erosion damage to land (ER 1130-2-400, para 11(c) and EM 1110-1-400, para 5-4).

Suggested Solutions:
Continue existing erosion control measures: periodic planting of vegetation adapted to sandy soil for erosion control and restrict use of ATVs in the area.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Wetlands at the project have not been identified and protected.

Criteria (What is the actual requirement?)
NR.7. Floodplains and wetlands should be identified and protected.

Suggested Solutions:
A wetland survey is scheduled for FY1999 to identify and delineate wetlands at Barre Falls Dam.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Project lacks threatened/endangered species survey.

Criteria (What is the actual requirement?)
NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

Suggested Solutions:
A threatened/endangered species survey is scheduled to be conducted during FY1999.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

GOOD

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

There is no minimum release rate established at Barre Falls Dam for periodic inspections and routine maintenance. During periodic inspections, flows are reduced in the conduit to allow safe access (there is only one conduit at Barre Falls Dam). Some flow is passed downstream due to leakage and closure is generally less than one hour which reduces impacts to downstream aquatic life to some degree.

Criteria (What is the actual requirement?)
NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

Suggested Solutions:
A Standard Operating Procedure (SOP) should be developed involving the Project Manager, Planning Directorate, Operations Technical Support Division and Water Control Division in coordination with State Department of Fish and Wildlife and the U.S. Fish and Wildlife Service agencies to assure that planned (non-emergency) closures for routine inspections are conducted in a manner which avoids impacts to downstream aquatic life.

Comments:
Non-emergency inspections and maintenance should be scheduled during low flow season and during the morning or late afternoon to minimize stream temperature increases. Flows should be reduced gradually to minimize strandings of downstream aquatic life.

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The Environmental Assessment for the Operation and Maintenance of Barre Falls Dam was written in May 1977. The document needs to be updated.

Criteria (What is the actual requirement?)
NR.

An updated EA/FONSI assessing impacts of current Operation and Maintenance of the Barre Falls Dam project on existing conditions is necessary to comply with the National Environmental Policy Act (NEPA) of 1969.

Suggested Solutions:
The Environmental Asssessment update is scheduled for FY1999.

Comments:

Assessor: Judith Johnson

OTHER ENVIRONMENTAL ISSUES

Natural Resources and Other Environmental Issues Narrative for
Barre Falls Dam ERGO Review

The ERGO Team Review and facility tour conducted on May 8, 1996 was very informative. The majority of natural resources compliance issues involve the preparation of documents (EA and Master Plan). This project has an approved OMP dated June 1993 which contains Forest and Fish and Wildlife Management Plans. One omission to the Fish and Wildlife Management Plan is a formal survey of threatened/endangered species for the project area. This information is necessary to complete a plan for maintenance, restoration or protection of habitat favorable to threatened/endangered species. A threatened/endangered species inventory is scheduled to be conducted in FY1999 and should be included in the OMP update (OMPs should be revised every 5 years). In addition, a wetland survey is scheduled during FY1999 and will be included in the EA.

Two findings were eliminated under the Special Pollutants Management, Noise section. The project now maintains a noise complaint log. There have been no problems related to the issue of noise. In addition, a noise survey was conducted in 1996.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
Project-wide

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Facility does not have a Pollution Prevention Plan.

Criteria (What is the actual requirement?)
O4.5.1. Installations/ CW facilities are required to prepare pollu- tion prevention plans by 31 December 1995 (EO 12856, Section 3-302(d)).

Suggested Solutions:
Develop and finalize a written Pollution Prevention Plan for the facility.

Comments:
Since Barre Falls Dam is not a "CW" (covered) facility pursuant to the above criteria, the Pollution Prevention Plan was not due until 30 September 1996. It was completed and approved in July of 1996.

Assessor: Robert W. Davis

PESTICIDE MANAGEMENT

No Findings

PETROLEUM, OIL AND LUBRICANT (POL) MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
Project-wide

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Barre Falls Dam does not perform mock spill or training events for potential petroleum and hazardous substance discharges (spills) in accordance with their approved Spill Prevention, Control, and Countermeasures Plan and Spill Contingency Plan (SPCCP/SCP).

Criteria (What is the actual requirement?)
PO.10.3. Facilities that are required to have a response plan are also required to develop and implement a facility response training program and a drill/exercise program that meet specific parameters (40 CFR 112.21).

Suggested Solutions:
Perform mock spill event and training exercises.

Comments:
Continue facility response training and implement a drill/exercise program.

Assessor: Robert W. Davis

SOLID WASTE MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
Between Dike 2 and Dike 3

GOOD

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

A pile of asphalt exists between Dike 2 and Dike 3, across from Blood Swamp.

Criteria (What is the actual requirement?)
SO.3.1. Installations/ CW facilities are required to comply with state and local solid waste regulations concerning solid waste management (EO 12088, Section 1-1).

Suggested Solutions:
Remove and dispose of the solid waste material (i.e. asphalt) in accordance with applicable State and local laws and regulations.

Comments:
The asphalt was dumped to protect the sweet fern experimental plot from ATVs, sometime in the early 1980s.

Assessor: Robert W. Davis

STORAGE TANKS MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
Gate House

GOOD

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

Secondary containment of piping to and from the fuel oil storage tanks at the project should be addressed.

Criteria (What is the actual requirement?) None

ST.5.1. All bulk storage tanks (over 660 gal [2498 L]) are required to be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

Albeit Paragraph 19.A.06(g) of EM 385-1-1 (1 October 1992) requires secondary containment for fuel storage tanks, no regulatory requirement exists for secondary containment of the piping except in the case of systems transporting hazardous wastes.

Suggested Solutions:
Installation and use of antisiphon devices (e.g. automatic cutoff valve) for fuel oil in the gate house would greatly reduce the potential for a contaminant release from a piping leak to the Ware River. Approximately 4.35 miles downstream of Barre Falls Dam is Coldbrook Dam and Intake Works which diverts water from the Ware River to the Quabbin Reservoir for public drinking water supply.

Comments:
The recent installation of upgraded aboveground storage tanks with secondary containment have resulted in significant pollution prevention improvements. However, concerns presently exist for older piping lacking secondary containment in sensitive environmental areas.

Assessor: Robert W. Davis

TOXIC SUBSTANCES MANAGEMENT

Toxic Substances Management Narrative for
Barre Falls Dam ERGO Review

PCBs:

Project Manager indicated that transformers on site contained no PCBs or they were dry transformers. Manufacturer confirmed that transformers which contained liquid oil were not PCB containing.

We discussed incoming electrical service and were informed that the only electrical service transformers were located off site at the entrance. No electrical service transformers or capacitors containing PCBs were believed to be on Corps property.

Asbestos:

Asbestos survey has been conducted. A contract has been issued to remove the remaining friable asbestos pipe insulation. Once this material has been removed the facility should be asbestos free.

Radon:

Radon surveys were conducted in FY1991. All results were less than 4 pCi/L and no further action is required at this time.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
Project Office and Gatehouse

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

There have been no PCB spills at this facility. A PCB survey of this facility has been completed. All potential PCB containing transformers have been verified by the manufacturer to be PCB free. It has not been determined if flourescent light ballasts contain PCBs.

Criteria (What is the actual requirement?)
T1.1.3. Installations/CW facilities are required to comply with state and local regulations concerning PCB management (EO 12088, Section 1-1).

Suggested Solutions:
Flourescent light ballasts should be checked. Ballast serial numbers can be verified by the manufacturer as containing PCBs or being non-PCB containing.

Comments:
In the event that ballasts are PCB containing, personnel should be informed of this fact. If ballasts are PCB containing, they should be identified, and appropriate personal protective equipment used if it is determined that a leaking or faulty unit is discovered.

Assessor: Kerry LeBlanc

WASTEWATER MANAGEMENT

No Findings

1996 BARRE FALLS DAM ERGO INSPECTION
WASTEWATER AND WATER QUALITY MANAGEMENT

1. General. Inspection of Barre Falls Dam was carried out on 8 May 1996. Project personnel appear to be taking environmental compliance seriously. No change was reported in water supply or wastewater disposal systems. Water is supplied from a well. Wastewater is disposed of through a septic tank and leaching field. Vehicle maintenance is performed on site by a contractor, and is performed inside during the winter.

2. Resolution of Past Findings - Wastewater Management.

No previous deficiencies.

3. Resolution of Past Findings - Water Quality Management.

a. Minor Deficiency. Well was being operated without a certified operator. Ken Levitt and Pete Trinchero are now certified operators for this well.

b. Minor Deficiency. Test results from the well need to be reported promptly to the State. Now that certified operators are in place, results can be reported.

4. Findings.

a. Minor Deficiency. There is a floor drain in the vehicle maintenance bay which discharges to the ground surface within the zone 1 of the water supply well. Massachusetts 310 CMR 22.21 (1) (b) 5 restricts activities within zone 1 to those directly related to public water supply or which have no significant adverse impact on water quality. Materials washed through the floor drain will end up in the groundwater within the zone 1, and have the direct potential to contaminate it.

b. Recommendation. Seal the floor drain with a permanent plug, or install an oil-water separator.

WATER QUALITY MANAGEMENT

1996 BARRE FALLS DAM ERGO INSPECTION
WASTEWATER AND WATER QUALITY MANAGEMENT

1. General. Inspection of Barre Falls Dam was carried out on 8 May 1996. Project personnel appear to be taking environmental compliance seriously. No change was reported in water supply or wastewater disposal systems. Water is supplied from a well. Wastewater is disposed of through a septic tank and leaching field. Vehicle maintenance is performed on site by a contractor, and is performed inside during the winter.

2. Resolution of Past Findings - Wastewater Management.

No previous deficiencies.

3. Resolution of Past Findings - Water Quality Management.

a. Minor Deficiency. Well was being operated without a certified operator. Ken Levitt and Pete Trinchero are now certified operators for this well.

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4. Findings.

a. Minor Deficiency. There is a floor drain in the vehicle maintenance bay which discharges to the ground surface within the zone 1 of the water supply well. Massachusetts 310 CMR 22.21 (1) (b) 5 restricts activities within zone 1 to those directly related to public water supply or which have no significant adverse impact on water quality. Materials washed through the floor drain will end up in the groundwater within the zone 1, and have the direct potential to contaminate it.

b. Recommendation. Seal the floor drain with a permanent plug, or install an oil-water separator.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

00960 MA BARRE FALLS DAM
Headquarters Building

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

There is a floor drain in the vehicle maintenance bay that discharges above ground within the Zone I protective radius required around the water supply well.

Criteria (What is the actual requirement?)
WQ.3.1. Installations/ CW facilities are required to comply with state and local water quality regulations (EO 12088, Section 1-1 and 42 USC 300h-7(h)).

Suggested Solutions:
Permanently plug the drain, or install an oil/water separator to prevent any releases to the environment.

Comments:
310 CMR 22.21(1)(b)5 requires that current and future land uses within Zone 1 be limited to those directly related to the public water system or will have no significant adverse impact on water quality.

Assessor: Townsend Barker

NEW ENGLAND DIVISION
ERGO TEAM

Bruce Williams - Program Manager
Operations Directorate - Operations Technical Support Division

Joseph Horowitz - ERGO Team Leader
Planning Directorate - Evaluation Division - Environmental Resources Branch

Judi Johnson
Planning Directorate - Evaluation Division - Environmental Resources Branch

Robert Davis
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Marc Paiva
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Townsend Barker
Engineering Directorate - Water Control Division
Chairman, NED's Water Quality Team

Kerry LeBlanc
NED Safety Office

Anne Laster
Real Estate Directorate - Conveyancing Division

The ERGO Team would like to thank the following individuals who participated in the pre-assessment evaluation, field inspection and/or in the research and evaluation of environmental compliance guidance:

Barre Falls Dam

Joseph Faloretti - Basin Manager
Chuck Sabine - Project Manager
Ralph Gendron - Park Ranger

APPENDICES

APPENDIX A: Previsit Questionnaires

BARRE FALLS

Table 1

ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

Name of Facility: BARRE FALLS DAM
Environmental POC: Gendron / Sabine
Telephone Number: 508/928-4712

	RESPONSE	REFERENCE IN TEAM
Section 1. Air Emissions Management		
1. Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank vents, etc.)? Inclusively list the types and numbers of each: Type of Permit: Motor Vehicle — Quantity: 1	Yes	If YES, see checklist item A.1.3
2. Does the facility operate a fuel burner (central steam plant or hot water steam boiler)? If YES, how large and what fuel is used? Size — Fuel	No	If YES, see checklist item A.10.1 through A.10.10
3. Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number. Type — Number	No	If YES, see checklist item A.25.1 through A.25.3 and A.41.1 through A.45.8
4. Does the facility operate fuel dispensing facilities? How many? _____	No	If YES, see checklist item A.55.1 through A.55.6
5. Does the facility use any volatile organic compound (VOC) based solvent degreasers?	No	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
6. Does the facility operate maintenance shops?	No	If YES, see checklist item A.1.3, A.85.1 through A.95.2

Type	Quantity
Wheeled	_____
Tracked	_____
Aircraft	_____

Please list any additionally shop activities that generate any form of air pollution (i.e., vehicle emissions systems, ventilation systems for various operations, etc.)

_____
_____
_____

7. Does the facility operate equipment or processes that could lead to fugitive emissions of vinyl chlorides or benzene?	No	If YES, see checklist item A.65.1 through A.65.7
What types of equipment? _____		
8. Does the facility procure/use chlorofluorocarbons (CFC) or halon substances?	Yes	If YES, see checklist item A.85.1 through A.85.4
9. Does the facility repair any units containing refrigerant?	No	If YES, see checklist item A.90.1 through A.95.2
10. Does the facility recycle/reclaim CFCs or halon?	No	If YES, see checklist item A.90.1 through A.95.2
11. Does the facility have any vapor emissions requirements for oil/water separators that have been imposed upon them.	No	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
Section 2. Cultural Resources Management		
1. Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places?	No	If YES, see checklist item C.5.1 through C.5.3
2. Are their any cultural resources (archeological sites, buildings over 50 yr old) that have not been evaluated for the National Register?	Yes	If YES, see checklist item C.5.1 through C.5.3
3. Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes?	No	If YES, see checklist item C.5.1.1
4. Is there an on-staff Cultural Resources Coordinator?	No	See Supplement
5. If not, does a staff person have cultural resources as "other duties as assigned"?	Yes	See Supplement
6. Does the facility have any archeological artifacts in storage?	No	If YES, see checklist item C.20.1 through C.20.9
7. Does the facility have in storage, or know of, any locations of Native American burials, cemeteries, or human remains?	No	If YES, see checklist item C.15.1 through C.15.2
8. Are there any areas on the facility considered to have religious importance to any Native American Tribe?	No	If YES, see checklist item C.10.1

	RESPONSE	REFERENCE IN TEAM
Section 3. Hazardous Materials Management		
1. Has the facility conducted training for individuals working with hazardous materials?	Yes	If YES, see checklist item HM.10.1 through HM.10.2
2. Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)?	No	If YES, see checklist item HM.1.3
3. Does the facility store any extremely hazardous substances?	No	If YES, see checklist item HM.25.1
4. Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)? (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.) Please list substances _____ _____ _____	No	If YES, see checklist item HM.30.1 through HM.30.3
5. Does the facility store any flammable/combustible liquids?	Yes	If YES, see checklist item HM.35.1 through HM.40.3
6. Does the facility store any compressed gases?	No	If YES, see checklist item HM.45.1

	RESPONSE	REFERENCE IN TEAM
Section 4. Hazardous Waste Management		
1. Is the facility a generator of hazardous waste?	Yes	If YES, see checklist item HW.10.1 through HW.10.2
2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?	Yes	If YES, see checklist item HW.15.1 through HW.15.6
3. Does the facility generate more than 100 kg [220.46 lb, approx. 28 gal] but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo?	No	If YES, see checklist item HW.20.1 through HW.45.5
4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?	No	If YES, see checklist item HW.55.1 through HW.90.6

	RESPONSE	REFERENCE IN TEAM

(NOTE: Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
- Reactive. (or CN).)

The following are hazardous wastes that may typically be found at a facility (check if used at this facility and indicate amount used):

- Solvents Mineral Spirits - 6 gal annually
(This includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits, and Xylene.)

- Liquid paint 12 Gals Annually
- Paint stripper, remover or thinner 6 " "
- Spray paint booth air filters N/A
- Pesticides, insecticides, herbicides - 5 Gals every two years - insect 12 CNS per year
- NRC filters and test kits N/A
- Super tropical bleach N/A
- Ordnance, ammunition, explosives and residues N/A
- Battery acid and caustics in unserviceable batteries 1 per yr
- Pharmaceuticals N/A
- POL tank farm fuel system filters N/A
- De-icing solution One 80# bag per year
- Printing ink, ink solvents, and cleaners N/A
- Absorbent material and soil contaminated with hazardous waste None
- Other
- Other
- Other

5. What Hazardous Waste permits have been applied for? Part A Very Small quanity generator Part B Interim Status None needed	Yes	If any, see checklist item HW.1.3
6. Does the facility accept wastes from other facilities for treatment, storage, or disposal?	No	If YES, see checklist item HW.105.1 through HW.170.5
7. Does the facility operate accumulation points? How many? Where?	No	See checklist items based on how much is generated

	RESPONSE	REFERENCE IN TEAM
8. Does the facility operate satellite accumulation points? How many? _____	No	See checklist items based on how much is generated
9. Does the facility treat hazardous waste onsite? How and where? _____	No	If YES, see checklist item HW.105.1 through HW.255.3
10. Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point? Where? _____	No	If YES, see checklist item HW.105.1 through HW.255.3
11. Does the facility dispose of hazardous waste onsite? How and where? _____	No	If YES, see checklist item HW.105.1 through HW.255.3

	RESPONSE	REFERENCE IN TEAM
Section 5. Natural Resources Management		
1. Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.)	Yes	If YES, see checklist item NR.1.3
2. Does the facility have a plan for managing its natural resources?	Yes	See Supplement
3. Are there any areas on the facility that have:	Yes	If YES, see checklist item NR.10.1 through NR.10.3
A. Wetlands? If so, are they permitted/regulated by definition? No		
B. Flood Plains? yes 25-yr < 50-yr ____ 100-yr ____		
C. Shoreline? No		
D. Forests? Yes		
4. Has a survey to locate and identify threatened and endangered species and critical habitats been initiated?	No	If YES, see checklist item NR.20.1 through NR.20.3
5. Does the facility have any endangered species on its property?	Unknown	If YES, see checklist item NR.20.1 through NR.20.3

	RESPONSE	REFERENCE IN TEAM
Section 6. Other Environmental Issues		
1. Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?	No	If YES, see checklist item O1.1.1 through O1.5.14
For current mission?		
For future Master Plan?		
Any construction projects, timber sales, etc.?		
2. Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e.,ranges, skeet ranges, helicopter pad, generators, highway transportation)?	No	If YES, see checklist item O2.1.1 through O2.1.3
3. Is the facility engaged in any real property transaction?	No	If YES, see checklist item O5.1.1 through O5.1.3 and see Supplement

	RESPONSE	REFERENCE IN TEAM
Section 7. Pesticide Management		
1. Does the facility use pesticides? Contractor application? Majority In-house application? Minor Both contractor and in-house application? Yes	Yes	If YES, see checklist item PM.5.1 through PM.20.2
2. Are any pesticide wastes disposed of at the facility?	No	If YES, see checklist item PM.55.1
3. Are pesticides stored on the facility? Please list locations. U.B. Paint locker	Yes	If YES, see checklist item PM.45.1 through PM.45.2
4. What are the pesticides used at the facility? (Attach a separate list if necessary) See Attached Sheets	———	NA
5. Are pesticides used at offsite satellite facilities?	No	If YES, see checklist item PM.5.1 through PM.45.2
6. Does the facility maintain a pesticide/entomology shop? If YES, is it permitted by the state?	No	If YES, see checklist item PM.45.1 through PM.45.2
7. Is there an annual inventory available for review?	Yes	See Supplement

	RESPONSE	REFERENCE IN TEAM
Section 8. Petroleum, Oil, and Lubricant (POL) Management		
1. Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans?	Yes	If YES, see checklist item PO.5.1 through PO.5.7
2. Is the SPCC/ISC exercised annually (mock spill events conducted)?	No	If YES, see checklist item PO.5.1 through PO.5.7
3. Does the facility store used oil?	No	If YES, see checklist item PO.60.1 through PO.90.1
Where? Less than 5 Gals per year		
4. Does the facility have any pipelines?	No	If YES, see checklist item PO.40.1 through PO.40.10
5. Does the facility operate any service stations?	No	If YES, see checklist item PO.45.1 through PO.45.4

	RESPONSE	REFERENCE IN TEAM

Section 9. Solid Waste Management

1. Does the facility have a solid waste management facility onsite? — No — If YES, see checklist item SO.30.1 through SO.95.2

TYPE	NUMBER
Landfill	_____
Incinerator	_____
Transfer Point	_____

2. Does the facility contract out the collection of its solid waste? — Yes — If YES, see checklist item SO.10.1 through SO.10.6

3. Does the facility have a: — No — If YES, see checklist item SO.25.1 through SO.25.4

solid waste recycling program? List commodities recycled:

_____

_____

Construction debris landfill:
Is it permitted? NO
Operated by: _____

4. Is waste transported offsite for disposal? — Yes — If YES, see checklist item SO.1.3

In landfills? yes

In incinerators? _____

Transfer Stations? _____

Recycling plant? _____

5. Does the facility dispose of ash residue or sludge: — No — If YES, see checklist item SO.1.3
Offsite? _____
Onsite? _____

6. Does the facility receive refuse from outside the United States? — No — If YES, see checklist item SO.100.1

If YES, is laboratory testing performed? _____

7. Does the facility operate battery shops, including charging areas within vehicle maintenance facilities? — No — If YES, see checklist item SO.1.3

If YES, how many? _____

	RESPONSE	REFERENCE IN TEAM

Section 10. Storage Tank Management

1. Does the facility have aboveground storage tanks (ASTs) used for the storage of petroleum products or hazardous waste? (Attach additional page if necessary) — Yes — See Attached Sheet

   If YES, see checklist item ST.5.1 through ST.20.3 and ST.100.1 through ST.150.2

Location	Substance	Capacity

2. Does the facility have any USTs? — No

   If YES, see checklist item ST.25.1 through ST.95.7

Location	Quantity	Size	Material Stored	Permitted

(Attach a separate inventory sheet if necessary)

3. Does the facility have any USTs out-of-service or abandoned? — No

   If YES, see checklist item ST.95.1 through ST.95.7

4. Is there a program in place to manage unserviceable/abandoned tanks? — No

   If YES, see checklist item ST.95.1 through ST.95.7

	RESPONSE	REFERENCE IN TEAM
Section 11. Toxic Substances Management		
1. Has the facility conducted a survey for PCBs?	Yes	If YES, see checklist item T1.10.1 through T1.10.3
2. Are PCBs or PCB-contaminated oils in use or stored at the facility in: Transformers NO Capacitors NO Electromagnets NO Heat Transfer or Hydraulic Systems NO Circuit Breaker NO Fluorescent Light Ballasts ? Other_____	_____	If YES, see checklist item T1.20.1 through T1.20.9 and T1.30.1 through T1.35.1
3. Does the facility dispose of PCBs or PCB items at the facility	No	If YES, see checklist item T1.50.1 through T1.50.11
4. Does the facility transport PCBs	No	If YES, see checklist item T1.45.1 through T1.45.2
5. Has the facility conducted a complete facility-wide asbestos survey?	Yes	See Supplement
6. Does an Asbestos Management Plan exist?	NO	See Supplement
7. Is maintenance done on items insulated with asbestos? Not since apr. 16. 1995 Part of heating system replacement (unknowingly)	_____	If YES, see checklist item T2.5.1 through T2.10.1
8. Has the facility undergone any asbestos removal projects in the past? How long ago? 1985 By contract or in-house? Contract	yes	If YES, see checklist item T2.5.1 through T2.10.1
9. Is there any asbestos on the facility that has been removed and is awaiting disposal?	yes	If YES, see checklist item T2.15.1 through T2.15.4
10. Will the facility have any demolition, remodeling, or renovation projects underway at the time of the assessment? Please identify those projects and buildings. _____ _____	No	If YES, see checklist item T2.5.1 through T2.10.1

	RESPONSE	REFERENCE IN TEAM
11. Is asbestos material removed by contract or in-house personnel?	Contract	If YES, see checklist item T2.10.1
12. Does the facility monitor for radon gas?	Yes	If YES, see checklist item T3.1.1 through T3.1.3
13. Is there a program to reduce radon threat?	N/A	See Supplement
14. Has the facility populace been informed of the final status?	Yes	See Supplement
15. Is the facility performing any lead based paint removal?	No	If YES, see checklist item T4.1.1 through T4.1.3

	RESPONSE	REFERENCE IN TEAM

Section 12. Wastewater Management

1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES) permit? Identify the types of discharges: — No — If YES, see checklist item WA.10.1 through WA.10.6

   Stormwater runoff permits? No
   Drainage water from dredge and fill materials? No
   Wastewater treatment plant? No
   How many and what size?
   Process wastewater? No
   Heat/Power production cooling blowdown water? No
   Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities? No
   Vehicle wash facilities? How many? No
   Plating shops? NO
   Does the facility maintain sedimentation holding ponds or seepage pits from vehicle/aircraft washing, maintenance shop drainage (shop operations and motor parks), and other activities? No
   Operate cooling towers and pass through water? No
   Septic Systems? No
   Fresh water wetlands? No
   Industrial waste system/discharge? No
   Lines which bypass treatment structures? No
   Other?

2. Does the facility discharges into a publicly owned treatment works (POTW) any of the following? — No — If YES, see checklist item WA.10.1 through WA.25.9

   Process wastewater?
   Domestic (sanitary) wastewater?
   Industrial wastewater treatment plant effluent?
   Other?

3. Are there any discharge bypass lines in the system? — No — If YES, see checklist item WA.25.1 through WA.25.9

4. Does the facility have any sludge disposal areas from vehicles/equipment washing operations? — No — If YES, see checklist item WA.1.3

   Is the sludge analyzed or characterized on a scheduled frequency prior to disposal? — N/A

5. What percent of vehicle maintenance is performed by contract? — 100 % — If YES, see checklist item WA.1.3

   Is it performed onsite or offsite? Offsite

	RESPONSE	REFERENCE IN TEAM
Section 13. Water Quality Management		
1. Does the facility operate a public drinking water system?	Yes	If YES, see checklist item WQ.10.1 through WQ.30.3
2. Does the facility maintain wellheads?	Yes	If YES, see checklist item WQ.1.3
3. Does the facility operate an underground injection well?	No	If YES, see checklist item WQ.1.3
4. Are there groundwater aquifers on the facility? Are they in use? ________	Unknown	If YES, see checklist item WQ.95.1
5. Is the facility located on a sole source aquifer?	No	If YES, see checklist item WQ.95.1
6. Are protective or preventative measures in place to prevent contamination of these aquifers?	Yes	If YES, see checklist item WQ.95.1
7. Are field water purification units used?	No	See Supplement

How is the backwash managed from these mobile units?

____
____
____
____

Signature of individual completing this form: C L Sabine - R.J. Gendron

Date completed: 21 Feb 96

CALENDAR YEAR 1995 ANNUAL PEST CONTROL PLAN Date 5 Dec. 1994
ANTICIPATED USAGE REPORT Page 1

PROJECT: Barre Falls Dam Division New England

PESTICIDE TRADE NAME	EPA CLASS	EPA REGISTRATION NUM
Round-up	Gen. Herbicide	524-308

TARGET PEST Woody vegetation and weeds

LOCATION DESCRIPTION Rip rap at dam, plus gravel slopes of dikes 1, 2, and 3

TOTAL ESTIMATED QUANTITY: Spot treatment TOTAL ESTIMATED ACREAGE: 15

PESTICIDE TRADE NAME	EPA CLASS	EPA REGISTRATION NUM
Wasp Stopper or Hornet+Wasp Jet Spray	Insecticide	239-239

TARGET PEST Hymenopterous insects

LOCATION DESCRIPTION In or on project structures including gatehouse, rest rooms, utility building, garage, and laboratory buildings

TOTAL ESTIMATED QUANTITY: spot treatment TOTAL ESTIMATED ACREAGE: N/A

PESTICIDE TRADE NAME	EPA CLASS	EPA REGISTRATION NUM

TARGET PEST

LOCATION DESCRIPTION

TOTAL ESTIMATED QUANTITY: TOTAL ESTIMATED ACREAGE:

* Section 7.

CENED-OD-PL (200) July 28,1994

MEMORANDUM FOR: BASIN MANAGER, LCRB

SUBJECT: Underground Storage Tank (UST) Enforcement.

1. Per your request, status report on leak detection/containment systems is provided.

Location	Type	Gals	Installed	Contained	Detection	Operational	Tested	Inspected
G.H.	A/G	260	1989	Yes	No	n/a	n/a	Weekly
U.B.	A/G	330	1992	Yes	No	n/a	n/a	Weekly
MTN.	U/G	550	1989	Yes	Yes	Yes	Monthly	n/a

2. *The emergency generator day tanks at Mt. Wachusett and the Gate House had containment systems installed this year.*

CHARLES L. SABINE
Project Manager
Barre Falls Dam

* Section 10.

Barre Falls FERC License

Table 1

ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

Name of Facility: BARRA FALLS WMA (Fish + Wildlife License)
Environmental POC: _____
Telephone Number: 508 837 3607

	RESPONSE	REFERENCE IN TEAM
Section 1. Air Emissions Management		
1. Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank vents, etc.)? Inclusively list the types and numbers of each: Type of Permit / Quantity _____ / _____ _____ / _____ _____ / _____	N	If YES, see checklist item A.1.3
2. Does the facility operate a fuel burner (central steam plant or hot water steam boiler)? If YES, how large and what fuel is used? Size / Fuel _____ / _____ _____ / _____ _____ / _____	N	If YES, see checklist item A.10.1 through A.10.10
3. Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number. Type / Number _____ / _____ _____ / _____ _____ / _____	N	If YES, see checklist item A.25.1 through A.25.3 and A.41.1 through A.45.8
4. Does the facility operate fuel dispensing facilities? How many? _____	N	If YES, see checklist item A.55.1 through A.55.6
5. Does the facility use any volatile organic compound (VOC) based solvent degreasers?	N	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
6. Does the facility operate maintenance shops?	N	If YES, see checklist item A.1.3, A.85.1 through A.95.2

Type	Quantity
Wheeled	_____
Tracked	_____
Aircraft	_____

Please list any additionally shop activities that generate any form of air pollution (i.e., vehicle emissions systems, ventilation systems for various operations, etc.)

_____

_____

_____

7. Does the facility operate equipment or processes that could lead to fugitive emissions of vinyl chlorides or benzene?	N	If YES, see checklist item A.65.1 through A.65.7
What types of equipment? _____		
8. Does the facility procure/use chlorofluorocarbons (CFC) or halon substances?	N	If YES, see checklist item A.85.1 through A.85.4
9. Does the facility repair any units containing refrigerant?	N	If YES, see checklist item A.90.1 through A.95.2
10. Does the facility recycle/reclaim CFCs or halon?	N	If YES, see checklist item A.90.1 through A.95.2
11. Does the facility have any vapor emissions requirements for oil/water separators that have been imposed upon them.	N	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
Section 2. Cultural Resources Management		
1. Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places?	N	If YES, see checklist item C.5.1 through C.5.3
2. Are their any cultural resources (archeological sites, buildings over 50 yr old) that have not been evaluated for the National Register?	N	If YES, see checklist item C.5.1 through C.5.3
3. Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes?	N	If YES, see checklist item C.5.1.1
4. Is there an on-staff Cultural Resources Coordinator?	N	See Supplement
5. If not, does a staff person have cultural resources as "other duties as assigned"?	N	See Supplement
6. Does the facility have any archeological artifacts in storage?	N	If YES, see checklist item C.20.1 through C.20.9
7. Does the facility have in storage, or know of, any locations of Native American burials, cemeteries, or human remains?	N	If YES, see checklist item C.15.1 through C.15.2
8. Are there any areas on the facility considered to have religious importance to any Native American Tribe?	UNK	If YES, see checklist item C.10.1

	RESPONSE	REFERENCE IN TEAM
Section 3. Hazardous Materials Management		
1. **Has the facility conducted training for individuals working with hazardous materials?**	N	If YES, see checklist item HM.10.1 through HM.10.2
2. **Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)?**	N	If YES, see checklist item HM.1.3
3. **Does the facility store any extremely hazardous substances?**	N	If YES, see checklist item HM.25.1
4. **Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)?** (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.) Please list substances _____ _____ _____	N	If YES, see checklist item HM.30.1 through HM.30.3
5. **Does the facility store any flammable/combustible liquids?**	N	If YES, see checklist item HM.35.1 through HM.40.3
6. **Does the facility store any compressed gases?**	N	If YES, see checklist item HM.45.1

	RESPONSE	REFERENCE IN TEAM
Section 4. Hazardous Waste Management		
1. Is the facility a generator of hazardous waste?	~	If YES, see checklist item HW.10.1 through HW.10.2
2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?	~	If YES, see checklist item HW.15.1 through HW.15.6
3. Does the facility generate more than 100 kg [220.46 lb, approx. 28 gal] but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo?	~	If YES, see checklist item HW.20.1 through HW.45.5
4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?	~	If YES, see checklist item HW.55.1 through HW.90.6

	RESPONSE	REFERENCE IN TEAM

(NOTE: Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
- Reactive. (or CN).)

The following are hazardous wastes that may typically be found at a facility (check if used at this facility and indicate amount used):

- Solvents _____

(This includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits, and Xylene.)

- Liquid paint _____
- Paint stripper, remover or thinner _____
- Spray paint booth air filters _____
- Pesticides, insecticides, herbicides _____
- NRC filters and test kits _____
- Super tropical bleach _____
- Ordnance, ammunition, explosives and residues _____
- Battery acid and caustics in unserviceable batteries _____
- Pharmaceuticals _____
- POL tank farm fuel system filters _____
- De-icing solution _____
- Printing ink, ink solvents, and cleaners _____
- Absorbent material and soil contaminated with hazardous waste _____
- Other _____
- Other _____
- Other _____

5. What Hazardous Waste permits have been applied for? — None — If any, see checklist item HW.1.3

   Part A
   Part B
   Interim Status
   None needed

6. Does the facility accept wastes from other facilities for treatment, storage, or disposal? — N — If YES, see checklist item HW.105.1 through HW.170.5

7. Does the facility operate accumulation points? — N — See checklist items based on how much is generated
   How many?_____
   Where?_____
   _____

	RESPONSE	REFERENCE IN TEAM
8. Does the facility operate satellite accumulation points? How many? _____	N	See checklist items based on how much is generated
9. Does the facility treat hazardous waste onsite? How and where? _____	N	If YES, see checklist item HW.105.1 through HW.255.3
10. Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point? Where? _____	N	If YES, see checklist item HW.105.1 through HW.255.3
11. Does the facility dispose of hazardous waste onsite? How and where? _____	N	If YES, see checklist item HW.105.1 through HW.255.3

	RESPONSE	REFERENCE IN TEAM
Section 5. Natural Resources Management		
1. Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.)	Y	If YES, see checklist item NR.1.3
2. Does the facility have a plan for managing its natural resources?	N	See Supplement
3. Are there any areas on the facility that have:		If YES, see checklist item NR.10.1 through NR.10.3
A. Wetlands? If so, are they permitted/regulated by definition?	YES	
B. Flood Plains?		
25-yr	?	
50-yr	(	
100-yr		
C. Shoreline?	N	
D. Forests?	Y	
4. Has a survey to locate and identify threatened and endangered species and critical habitats been initiated?	YES SOMEWHAT	If YES, see checklist item NR.20.1 through NR.20.3
5. Does the facility have any endangered species on its property?	UNK.	If YES, see checklist item NR.20.1 through NR.20.3

	RESPONSE	REFERENCE IN TEAM
Section 6. Other Environmental Issues		
1. Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?	N	If YES, see checklist item O1.1.1 through O1.5.14
For current mission?		
For future Master Plan?		
Any construction projects, timber sales, etc.?		
2. Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e.,ranges, skeet ranges, helicopter pad, generators, highway transportation)?	N	If YES, see checklist item O2.1.1 through O2.1.3
3. Is the facility engaged in any real property transaction?	N	If YES, see checklist item O5.1.1 through O5.1.3 and see Supplement

	RESPONSE	REFERENCE IN TEAM
Section 7. Pesticide Management		
1. Does the facility use pesticides? Contractor application? _____ In-house application? _____ Both contractor and in-house application? _____	N	If YES, see checklist item PM.5.1 through PM.20.2
2. Are any pesticide wastes disposed of at the facility?	N	If YES, see checklist item PM.55.1
3. Are pesticides stored on the facility? Please list locations. _____ _____ _____	N	If YES, see checklist item PM.45.1 through PM.45.2
4. What are the pesticides used at the facility? (Attach a separate list if necessary) _____ _____ _____ _____	N	NA
5. Are pesticides used at offsite satellite facilities?	N	If YES, see checklist item PM.5.1 through PM.45.2
6. Does the facility maintain a pesticide/entomology shop? If YES, is it permitted by the state?	N	If YES, see checklist item PM.45.1 through PM.45.2
7. Is there an annual inventory available for review?	N	See Supplement

	RESPONSE	REFERENCE IN TEAM
Section 8. Petroleum, Oil, and Lubricant (POL) Management		
1. Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans?	N	If YES, see checklist item PO.5.1 through PO.5.7
2. Is the SPCC/ISC exercised annually (mock spill events conducted)?	N	If YES, see checklist item PO.5.1 through PO.5.7
3. Does the facility store used oil?	N	If YES, see checklist item PO.60.1 through PO.90.1
Where? _____ _____ _____ _____		
4. Does the facility have any pipelines?	N	If YES, see checklist item PO.40.1 through PO.40.10
5. Does the facility operate any service stations?	N	If YES, see checklist item PO.45.1 through PO.45.4

	RESPONSE	REFERENCE IN TEAM

Section 9. Solid Waste Management

1. Does the facility have a solid waste management facility onsite? N
   TYPE NUMBER

   Landfill _____
   Incinerator _____
   Transfer Point _____

   If YES, see checklist item SO.30.1 through SO.95.2

2. Does the facility contract out the collection of its solid waste? N

   If YES, see checklist item SO.10.1 through SO.10.6

3. Does the facility have a: N

   solid waste recycling program? List commodities recycled:
   _____
   _____

   If YES, see checklist item SO.25.1 through SO.25.4

   Construction debris landfill:
   Is it permitted?
   Operated by: _____

4. Is waste transported offsite for disposal? N

   If YES, see checklist item SO.1.3

   In landfills?_____

   In incinerators?_____

   Transfer Stations?_____

   Recycling plant?_____

5. Does the facility dispose of ash residue or sludge: N
   Offsite?_____
   Onsite?_____

   If YES, see checklist item SO.1.3

6. Does the facility receive refuse from outside the United States? N

   If YES, is laboratory testing performed?_____

   If YES, see checklist item SO.100.1

7. Does the facility operate battery shops, including charging areas within vehicle maintenance facilities? N

   If YES, see checklist item SO.1.3

   If YES, how many? _____

	RESPONSE	REFERENCE IN TEAM

Section 10. Storage Tank Management

1. Does the facility have aboveground storage tanks (ASTs) used for the storage of petroleum products or hazardous waste? (Attach additional page if necessary) — N — If YES, see checklist item ST.5.1 through ST.20.3 and ST.100.1 through ST.150.2

Location	Substance	Capacity

2. Does the facility have any USTs? — N — If YES, see checklist item ST.25.1 through ST.95.7

Location	Quantity	Size	Material Stored	Permitted

(Attach a separate inventory sheet if necessary)

3. Does the facility have any USTs out-of-service or abandoned? — N — If YES, see checklist item ST.95.1 through ST.95.7

4. Is there a program in place to manage unserviceable/abandoned tanks? — N — If YES, see checklist item ST.95.1 through ST.95.7

	RESPONSE	REFERENCE IN TEAM
Section 11. Toxic Substances Management		
1. **Has the facility conducted a survey for PCBs?**	N	If YES, see checklist item T1.10.1 through T1.10.3
2. **Are PCBs or PCB-contaminated oils in use or stored at the facility in:** Transformers_____ Capacitors_____ Electromagnets_____ Heat Transfer or Hydraulic Systems_____ Circuit Breaker_____ Fluorescent Light Ballasts_____ Other_____	N	If YES, see checklist item T1.20.1 through T1.20.9 and T1.30.1 through T1.35.1
3. **Does the facility dispose of PCBs or PCB items at the facility**	N	If YES, see checklist item T1.50.1 through T1.50.11
4. **Does the facility transport PCBs**	N	If YES, see checklist item T1.45.1 through T1.45.2
5. **Has the facility conducted a complete facility-wide asbestos survey?**	N	See Supplement
6. **Does an Asbestos Management Plan exist?**	N	See Supplement
7. **Is maintenance done on items insulated with asbestos?**	N	If YES, see checklist item T2.5.1 through T2.10.1
8. **Has the facility undergone any asbestos removal projects in the past?** How long ago? _____ By contract or in-house? _____	N	If YES, see checklist item T2.5.1 through T2.10.1
9. **Is there any asbestos on the facility that has been removed and is awaiting disposal?**	N	If YES, see checklist item T2.15.1 through T2.15.4
10. **Will the facility have any demolition, remodeling, or renovation projects underway at the time of the assessment?** Please identify those projects and buildings. _____ _____	N	If YES, see checklist item T2.5.1 through T2.10.1

	RESPONSE	REFERENCE IN TEAM
11. Is asbestos material removed by contract or in-house personnel?	N	If YES, see checklist item T2.10.1
12. Does the facility monitor for radon gas?	N	If YES, see checklist item T3.1.1 through T3.1.3
13. Is there a program to reduce radon threat?	N	See Supplement
14. Has the facility populace been informed of the final status?	N	See Supplement
15. Is the facility performing any lead based paint removal?	N	If YES, see checklist item T4.1.1 through T4.1.3

	RESPONSE	REFERENCE IN TEAM

Section 12. Wastewater Management

1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES) permit? Identify the types of discharges: N — If YES, see checklist item WA.10.1 through WA.10.6

   Stormwater runoff permits?_____
   Drainage water from dredge and fill materials?_____
   Wastewater treatment plant? _____
   How many and what size?_____
   Process wastewater?_____
   Heat/Power production cooling blowdown water?_____
   Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities?_____
   Vehicle wash facilities? How many?_____
   Plating shops? _____
   Does the facility maintain sedimentation holding ponds or seepage pits from vehicle/aircraft washing, maintenance shop drainage (shop operations and motor parks), and other activities?
   _____
   Operate cooling towers and pass through water? _____
   Septic Systems?_____
   Fresh water wetlands?_____
   Industrial waste system/discharge?_____
   Lines which bypass treatment structures?_____
   Other?_____

2. Does the facility discharges into a publicly owned treatment works (POTW) any of the following? N — If YES, see checklist item WA.10.1 through WA.25.9

   Process wastewater?_____
   Domestic (sanitary) wastewater?_____
   Industrial wastewater treatment plant effluent?_____
   Other?_____

3. Are there any discharge bypass lines in the system? N — If YES, see checklist item WA.25.1 through WA.25.9

4. Does the facility have any sludge disposal areas from vehicles/equipment washing operations? N — If YES, see checklist item WA.1.3

   Is the sludge analyzed or characterized on a scheduled frequency prior to disposal?

5. What percent of vehicle maintenance is performed by contract? 0 — If YES, see checklist item WA.1.3

   Is it performed onsite or offsite?_____

	RESPONSE	REFERENCE IN TEAM
Section 13. Water Quality Management		
1. Does the facility operate a public drinking water system?	N	If YES, see checklist item WQ.10.1 through WQ.30.3
2. Does the facility maintain wellheads?	N	If YES, see checklist item WQ.1.3
3. Does the facility operate an underground injection well?	N	If YES, see checklist item WQ.1.3
4. Are there groundwater aquifers on the facility?	UNK.	If YES, see checklist item WQ.95.1
Are they in use? _____		
5. Is the facility located on a sole source aquifer?	UNK.	If YES, see checklist item WQ.95.1
6. Are protective or preventative measures in place to prevent contamination of these aquifers?	N	If YES, see checklist item WQ.95.1
7. Are field water purification units used?	N	See Supplement

How is the backwash managed from these mobile units?

_____

_____

_____

_____

Signature of individual completing this form: L. C. Thurber

Date completed: 3-20-96

Additional Information

ATTENTION: The following records should be available for review by the assessment team either prior to the assessment or immediately upon arrival at the facility. Not all facilities will have, or are even required to have, all of the following documents.

General

1. Detailed maps of the facility indicating street names and building numbers. Enough for one for every member of the assessment team.
2. A phone list.
3. Copies of notice of violations (NOVs) issued to the facility in any of these areas.
4. A copy of the Building Information Schedule (activity listing by building number).

Air Emissions Management

1. Air emissions inventory.
2. All air related permits.
3. A list of steam generating units and boilers and their size, fuel used, and locations.

Cultural Resources Management

1. Any cultural or archeological resources surveys.
2. Management plans for cultural and archeological resources.
3. A list of properties nominated for the National Register.

Hazardous Materials Management

1. A list of hazardous material storage/use areas.
2. A waste minimization plan
3. MSDS.
4. Documentation of personnel training.
5 The OHSCP
6. A copy of any reports of spills.
7. Copies of the Tier I or Tier II reports.
8. Documentation on contaminated sites.

Hazardous Waste Management

1. The Hazardous Waste Management Plan.
2. A list of hazardous wastes generated at the facility.
3. A list of waste generation/storage areas.
4. USEPA Identification number.
5. Manifests.
6. Any permits.
7. The biennial report.
8. Personnel training records.

Natural Resources Management

1. The endangered species survey.
2. The Natural Resources Management Plan.
3. Any land management plans.
4. Section 404 permits.

Other Environmental Issues
1. Copies of EISs, EAs, FNSIs.
2. Noise complaint log.

Pesticides Management
1. The Pesticide Management Plan.
2. A list of pesticide storage sites.
3. Application records.
4. MSDSs for pesticides.
5. Personnel Certifications for applicators.
6. Contracts for pesticide application.

POL Management
1. The SPCC plan.
2. A list of POL storage areas (not including tanks).

Solid Waste Management
1. Any contracts with waste haulers.
2. Any recycling plans.
3. All documentation pertaining to landfill operation or closure.
4. Records on groundwater sampling resulting from monitoring wells.

Storage Tank Management
1. A list of facility storage tanks (POL, hazardous waste, etc.).
2. Upgrading and/or closure plans for USTs.
3. Release detection documentation.
4. Integrity test results for ASTs and USTs.
5. Site contamination reports after tank removal.

Toxic Substances Management
1. The PCB inventory and annual report.
2. The results of the asbestos survey.
3. The Asbestos Management Plan.
4. Radon survey results.

Wastewater Management
1. All NPDES/SPDES permits.
2. Maps of the storm, sanitary, and industrial sewers.
3. A copy of pretreatment standards imposed on the facility.
4. A list of maintenance shops/operations to include wash facilities.
5. Locations of holding ponds, sedimentation pits, and open/end-of-pipe discharge points.

Water Quality Management
1. Copies of drinking water test results.
2. Copies of reports to the state.

CYCLE II EXTERNAL
ENVIRONMENTAL COMPLIANCE ASSESSMENT
PRELIMINARY FINDINGS REPORT

NEW ENGLAND DIVISION ENVIRONMENTAL LABORATORY
HUBBARDSTON, MASSACHUSETTS

U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts
02254-9149

December 1996

EXECUTIVE SUMMARY

An environmental compliance assessment of the New England Division (NED) Environmental Laboratory, Hubbardston, Massachusetts was conducted by a team of NED environmental professionals on 8 May 1996. This was a Cycle II External Assessment. The Cycle I External Assessment was conducted on 31 August-4 September 1992.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program, developed by the U.S. Army establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, State, local, Department of Defense (DoD), and U.S. Army environmental laws and regulations.

An overall ERGO compliance assessment considers 13 major environmental compliance categories. For each category, Federal, State and local laws, DoD and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained. The summary of deficiencies at the Environmental Laboratory is as follows:

Significant Deficiencies - 0
Problems that pose a direct and immediate threat to human health, safety, the environment, or the facility's mission, and require immediate attention.

Major Deficiencies - 1
Problems that require action, but not necessarily immediate action, and pose a threat to human health, safety or the environment.

Minor Deficiencies - 3
Deficiencies that are usually administrative in nature. These problems require monitoring or planning for future mitigation.

Management Practices - 3
Items noted are not specifically covered by a specific regulatory requirement; however, they still require management attention.

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THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

1) Enhance Corps of Engineers environmental compliance at Federal, State and local levels.

2) Improve Corps of Engineers environmental management.

3) Build supporting financial programs and budgets.

4) Assure supervisors that their environmental programs are being implemented effectively in accordance with Corps of Engineers goals and objectives.

Periodic environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and provide necessary feedback to supervisors for organizing, directing, and controlling environmental compliance and protection activities.

New England Division's (NED's) ERGO program became operational in 1991. Because it is responsible for the majority of USACE facilities, Operations Directorate is tasked with the development and implementation of the ERGO program. Every five years, each NED project undergoes an external environmental compliance assessment. This assessment is conducted by a team of environmental professionals. Every NED project has already had one external environmental compliance assessment. The assessment described in this report is the second external assessment for this project, and is therefore known as a Cycle II External Environmental Compliance Assessment. The project itself is responsible for performing an internal self assessment annually, with the exception of those years when an external assessment is being done.

ASSESSMENT PROCEDURES

The ERGO assessment of the NED Environmental Laboratory was conducted by a 7 person team comprised of NED personnel, and took place on 8 May 1996. The team followed a three phase approach. The first phase was to obtain pre-assessment information concerning its on-site activities (see Appendix A - Previsit Questionnaire) and research applicable Federal, State and local environmental regulations. This culminated in the development of site/facility-specific categories.

The second phase involved the on-site portion of the assessment. This involved an interview of Laboratory staff, followed by a facility tour, to obtain a general overview of the facility operations. Typically, the team member would interview staff responsible for a particular functional area, visually inspect the operations, and verify that required written documentation was in place. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the Laboratory staff to apprise them of the review team's preliminary findings.

The third phase involves developing the draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of the NED Environmental Laboratory followed the above procedures and covered the elements set forth in the 13 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment is based on observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered and, therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of the NED Environmental Laboratory was dependent on complete disclosure by Laboratory staff of all information regarding the operation and maintenance activities at the Laboratory.

It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

ERGO PROGRAM OBJECTIVES

The Environmental Review Guide for Operations (ERGO) program guidance is embodied primarily in two publications: The Environmental Assessment and Management (TEAM) Guide, applicable to participating DoD components, including the U.S. Army Corps of Engineers (USACE), and the Supplement to The Environmental Assessment and Management (TEAM) Guide, applicable to Corps of Engineers Civil Works activities, operating projects and floating plant, including outgranted lands and concessions. In addition, state-specific supplements have been prepared for some states.

Objectives of the TEAM Guide are as follows:

1. Compile applicable Federal regulations with DoD component operations and activities.

2. Synthesize environmental regulations, management practices, and risk management issues into consistent and easy to use checklists.

3. Serve as an aid in the assessment process and management action development phases of DoD component environmental assessment programs.

Objectives of the Supplement to the TEAM Guide are as follows:

1. Compile applicable Department of Defense (DoD) regulations, and Engineer Regulations (ERs) associated with USACE operations and activities.

2. Synthesize regulations, management practices, and risk management issues into consistent and easy-to-use checklists.

3. Serve as a reference document and educational tool for daily operations.

4. Serve as a guide for implementing the U.S. Army Environmental Strategy Into the 21st Century, which emphasizes environmental stewardship as an integral part of everything the USACE does.

DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, Federal regulations, State regulations and local regulations. Non-regulatory items, which are referred to in this report as management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will be categorized as follows:

SIGNIFICANT DEFICIENCY:

A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facility's mission.

MAJOR DEFICIENCY:

A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety or the environment. Any immediate threat, however, must be categorized as significant.

MINOR DEFICIENCY:

Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of noncompliance.

MANAGEMENT PRACTICE:

Management practice items are those for which there is no specific regulatory requirement; however they still require management attention.

Summary of Deficiencies for NED Environmental Laboratory

ERGO Compliance Categories	Sign. Findings	Major Findings	Minor Findings	MP Findings
Air Emissions Management	0	0	0	0
Cultural Resources Management	0	0	0	0
Hazardous Materials Management	0	0	1	1
Hazardous Waste Management	0	0	0	1
Natural Resources Management	0	0	0	0
Other Environmental Issues	0	0	1	0
Pesticide Management	0	0	0	0
POL Management	0	0	0	0
Solid Waste Management	0	0	0	1
Storage Tank Management	0	0	0	0
Toxic Substances Management	0	1	1	0
Wastewater Management	0	0	0	0
Water Quality Management	0	0	0	0
Totals	0	1	3	3

AIR EMISSIONS MANAGEMENT

No Findings

CULTURAL RESOURCES MANAGEMENT

No Findings